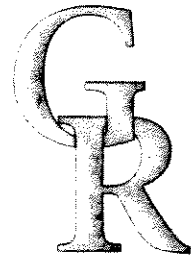


# Gummerson & Rausch

Tom E. Rausch



March 17, 2008

Ms. Cynthia J. Szymanski Koroll  
SZYMANSKI KOROLL LITIGATION GROUP  
One Court Place, Suite 102  
Rockford, IL 61101

Re: Njos vs. Rockford Health System, et al.;  
Case No. 07 C 50213;  
Our File No. 35032-004

Dear Ms. Koroll:

On November 21, 2007, we served interrogatories and a production request, upon you regarding the above-entitled matter. As of this date, we have received neither signed answers to interrogatories nor compliance with our production requests.

Pursuant to Federal Rule of Civil Procedure 37(a)(1), please provide both signed answers to interrogatories and compliance with our production requests within the next 14 days in order to avoid Court intervention.

Additionally, enclosed please find a notice of deposition for your client's deposition on May 20, 2008, at 10:00 a.m. Please let me know if this date is convenient for you and your client.

Thank you for your cooperation.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

GUMMERSON & RAUSCH, LLC

Tom E. Rausch

Enclosure



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

SANDRA NJOS,	)	
<i>Plaintiff,</i>	)	
	)	
vs.	)	NO. 07 C 50213
	)	
ROCKFORD HEALTH SYSTEM, an Illinois	)	Judge Philip G. Reinhard
not-for-profit Corporation, ROCKFORD	)	Magistrate P. Michael Mahoney
MEMORIAL HOSPITAL, an Illinois	)	
not-for-profit Corporation, ROBERT	)	
ESCARZA, M.D., & RHONDA	)	
CASAVANT, R.N.	)	
<i>Defendants.</i>	)	

**NOTICE OF DEPOSITION**

TO: Ms. Cynthia Szymanski Koroll  
Mr. Karl Szymanski  
One Court Place  
Suite 102  
Rockford, IL 61101

**YOU ARE HEREBY NOTIFIED** that the undersigned will take the following depositions before a Notary Public or other authorized officer on the date and at the place and time set forth below:

DEPONENT: Sandra Njos  
DATE: May 20, 2008  
TIME: 10:00 a.m.  
PLACE: GUMMERSON & RAUSCH, LLC, 101 S. Benton Street, Suite 201,  
Woodstock, IL 60098  
PURPOSE: Discovery

**YOU ARE HEREBY FURTHER NOTIFIED** that you, by this Notice, are required to have present at the time, date and place stated, the said Deponent for oral examination for the above purpose pursuant to the Federal Rules of Civil Procedure.

DATE: March 17, 2008.

GUMMERSON & RAUSCH, LLC,  
Attorneys for Defendants

By: \_\_\_\_\_

Tom E. Rausch

GUMMERSON & RAUSCH, LLC  
101 S. Benton Street, Suite 201  
Woodstock, IL 60098  
(815) 337-7700

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STATE OF ILLINOIS       )  
                                      ) ss.  
COUNTY OF McHENRY    )

PROOF OF SERVICE BY FACSIMILE AND MAIL

I, the undersigned, a non-attorney, being first duly sworn upon oath, depose and state that I served this Notice of Deposition by faxing and mailing a copy of same to the persons shown above at their respective fax numbers and addresses shown therein on March 18<sup>th</sup>, 2007.

\_\_\_\_\_  
*Beth A. Sayre*

Subscribed and sworn to before me  
this 18<sup>th</sup> day of March, 2007.

\_\_\_\_\_  
*Karla Wagon*  
Notary Public

